

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE SUBPOENAS SERVED ON LLOYDS
BANKING GROUP PLC; LLOYDS AMERICA
SECURITIES CORPORATION; LLOYDS
BANK CORPORATE MARKETS PLC; THE
CANADIAN IMPERIAL BANK OF
COMMERCE; CIBC BANK U.S.A.; BANK OF
AMERICA CORPORATION; BANK OF
AMERICA, N.A.; WELLS FARGO &
COMPANY; WELLS FARGO BANK, N.A.;
THE GOLDMAN SACHS GROUP, INC.;
GOLDMAN SACHS & CO. LLC; GOLDMAN
SACHS INTERNATIONAL; MORGAN
STANLEY; MORGAN STANLEY & CO. LLC;
MORGAN STANLEY & CO.
INTERNATIONAL PLC; MIZUHO BANK,
LTD.; MIZUHO AMERICAS LLC; MIZUHO
SECURITIES USA LLC; CRÉDIT AGRICOLE
CIB; CREDIT AGRICOLE SECURITIES (USA)
INC.; CREDIT AGRICOLE AMERICA
SERVICES, INC.; SOCIÉTÉ GÉNÉRALE S.A.;
SG AMERICAS SECURITIES, LLC; BANCO
SANTANDER, S.A.; AND SANTANDER
HOLDINGS USA, INC.:

UKRAINE,

Petitioner,

-against-

PAO TATNEFT,

Respondent.

Case No.: 1:21-mc-00376-JGK-SN

**DECLARATION OF LAUREN K. HANDELSMAN IN SUPPORT OF RESPONDENT'S
OPPOSITION TO UKRAINE'S MOTION TO QUASH THIRD-PARTY SUBPOENAS**

LAUREN K. HANDELSMAN declares under penalty of perjury pursuant to 28 U.S.C.

§ 1746 as follows:

1. I am a partner at the law firm of Binder & Schwartz LLP, counsel for Respondent PAO Tatneft ("Tatneft" or "Respondent").

2. I submit this declaration in support of Respondent's Opposition to Ukraine's Motion to Quash Third-Party Subpoenas ("the Opposition"). The information set forth below is based upon my personal knowledge.

3. Attached hereto are true and correct copies of the following exhibits cited in the Opposition:

Exhibit	Description
1.	Tatneft's First Set of Interrogatories to Ukraine, dated February 23, 2021
2.	Tatneft's First Set of Requests for Production of Documents to Ukraine, dated February 23, 2021
3.	Letter from M. Kostytska to J. Blackman re: objections to service of discovery requests, dated March 22, 2021
4.	Letter from J. Blackman to M. Kostytska re: response to objections to service of discovery requests, dated March 24, 2021
5.	Letter from M. Kostytska to J. Blackman re: objections to service of third-party subpoenas, dated March 24, 2021
6.	Letter from M. Kostytska to L. Handelsman re: objections to service of third-party subpoenas, dated March 24, 2021
7.	Email from T. Buchanan to J. Blackman re: negotiations over scope of subpoenas, dated April 1, 2021

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 10, 2021 in New York, New York.

By: /s/ Lauren K. Handelsman
Lauren K. Handelsman